REMARKS

Claims 1-22 are pending. Claims 1-6, 8, 10-13, 16, and 18-22 have been amended for clarity and to improve their form.

An objection is presented in the Office Action on the basis that the drawings do not comply with 37 C.F.R. § 1.84(p)(4). Replacement drawings accompany this amendment to address this concern. In Fig. 4, reference character "68" has been corrected to --58-- for consistency with the specification at page 8, line 10. In Fig. 10, the reference for the trainer module has been corrected from "110" to --109--, and a corresponding amendment has been made to the specification on page 10, line 4. Withdrawal of this objection respectfully is requested.

The Office Action includes objections to the drawings on the basis that they do not comply with 37 C.F.R. § 1.84(p)(5). Corrections to the specification have been made on page 9, lines 21 and 23, and on page 10, line 3. Also, replacement drawings are attached in which reference numbers --139-- and --150-- have been added to Figs. 13 and 14, respectively. Withdrawal of these objections respectfully is requested.

The Office Action raises objections to the specification based on informalities. The specification has been amended to address these concerns. Withdrawal of these rejections respectfully is requested.

Claims 1-12 stand rejected under 35 U.S.C. § 112, second paragraph, based on indefiniteness. Claims 1, 5, and 6 have been amended to address these concerns. Withdrawal of this rejection respectfully is requested.

Claims 1, 3, 4, 13, 17, and 22 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Pat. No. 5,551,011 to Danby et al. Applicant respectfully traverses this rejection.

Claims 1, 13, and 22 recite, *inter alia*, simulating flexographic printing based on user-controlled flexographic printing process parameters. Flexographic printing processing data and a *dynamic flexographic printing model* are used to generate flexographic printing simulation data.

Danby et al. discloses a simulator for paper manufacture, not for flexographic printing. Significantly, Danby et al. does not disclose a dynamic model of the print process, as recited in independent claims 1, 13, and 22 of the present application. Instead, the dynamic model disclosed by Danby et al. is of a paper sheet-making process. In addition, Danby et al. refers to paper making, not printing, when discussing process parameters. Danby et al. does not disclose user control or process data related to print process output, except for the choice of a type of print process, such as "rotogravure, lithogravure, letter or a hypothetical process" (see col. 5, lines 2-3), and ink quantity for a dot. These are small parts of a printing process, and do not anticipate a formal model of a flexographic printing process, or set of databases, as recited in claim 1, for example, including flexographic printing process variable and their ranges, or potential interactions between the flexographic printing process variables and their effects.

Other significant differences exist between the paper manufacturing process simulated in Darby and the printing process simulated by the present invention. For example, Danby et al. does not simulate multicolor printing, nor does the Danby et al. disclosure illustrate the overall appearance of an image. Instead, the Danby et al.

simulator focuses on the approximate transfer and penetration of ink for a "dot," not dot size, dot shape, or larger scale faults linked to dots of many colors being juxtaposed (multicolor printing). In addition, Danby et al. deals with sheet paper, whereas the inventive simulator treats rolls of paper, thus introducing not only variables concerning the paper surface, but also variables concerning the roll tension, the way the roll was prepared (correctly spooled, out of round, too humid), etc. The inventive simulator also includes printing on other materials besides paper, such as cardboard, corrugated carton, plastic film, and foil. Independent claims 1, 13, and 22 are not anticipated by Danby et al., and are submitted as patentable over the cited prior art. Claims 2-12 and 14-22 depend on claims 1 and 13, respectively, and are patentable over Danby et al. for at least the same reasons.

The secondary references to Aingher, Karel, Horiuchi et al., and Pung et al. have not been applied against either of the independent claims 1 and 13, and in any event would not cure the deficiencies of Danby et al.[1]

[1] Applicant notes that no prior art has been cited against claim 12 in the Office Action. Other clerical errors include the rejection of claim 17 listed in paragraph 25 on page 7 of the Office Action, which lacks a detailed description in subsequent paragraphs 26-33. Also, rejections of claims 14, 15, and 18 are detailed in paragraphs 30, 31, and 33, respectively, but the claims are not listed in paragraph 25.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Dated: September 20, 2004

Respectfully submitted,

By _____

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AMENDMENTS TO THE DRAWINGS

Replacement sheets containing amended drawing Figs. 4, 10, 13, and 14 accompany this amendment, along with marked versions of the drawings indicating the proposed changes.

More specifically, in Fig. 4, reference number "68" has been replaced by reference number --58--. In Fig. 10, reference number "110" has been replaced by reference number --109--. In Fig. 13, missing reference number --139-- and a lead line have been added. In Fig. 14, missing reference number 150 has been added.

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FIG. 4

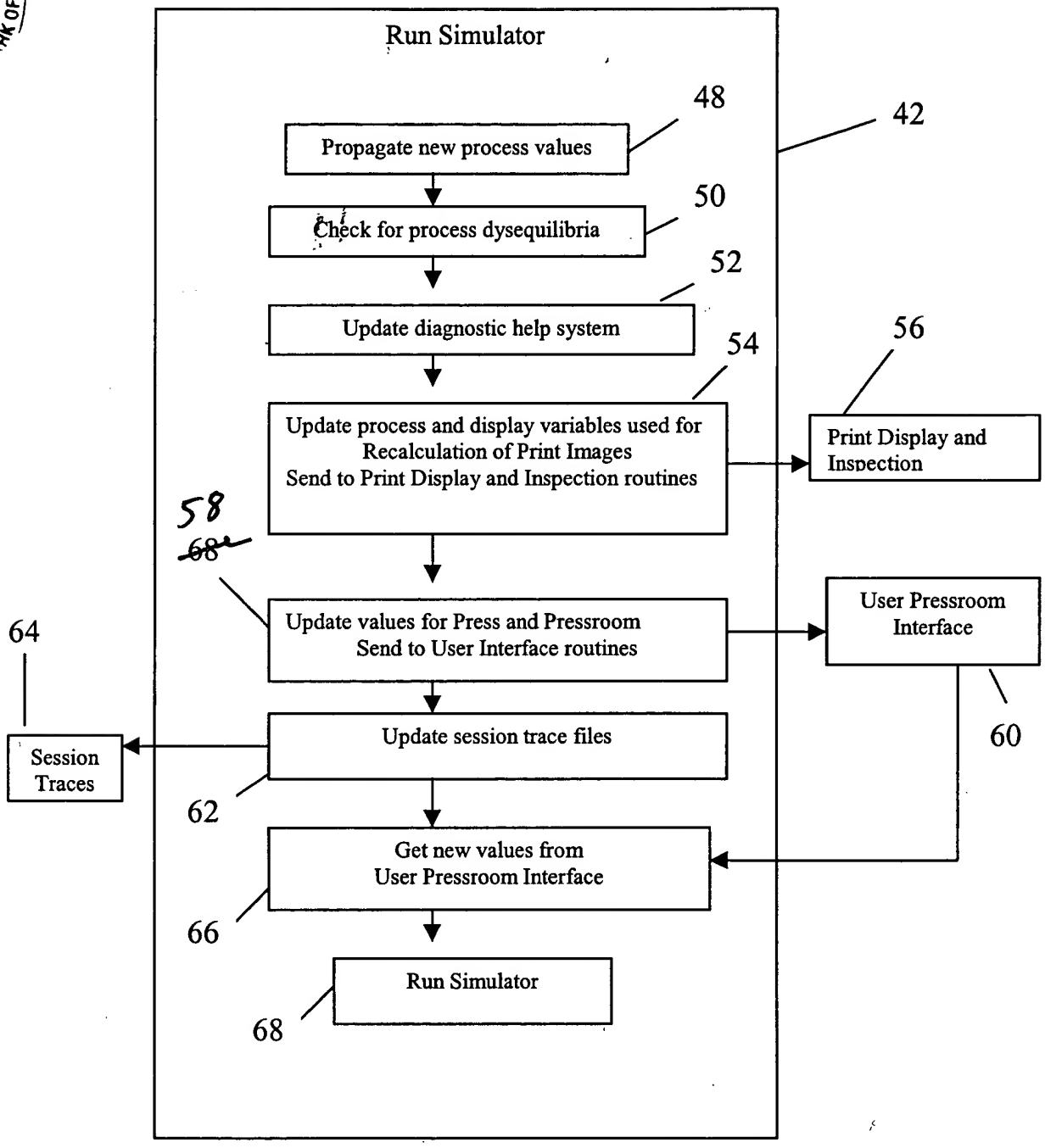

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FIG. 10

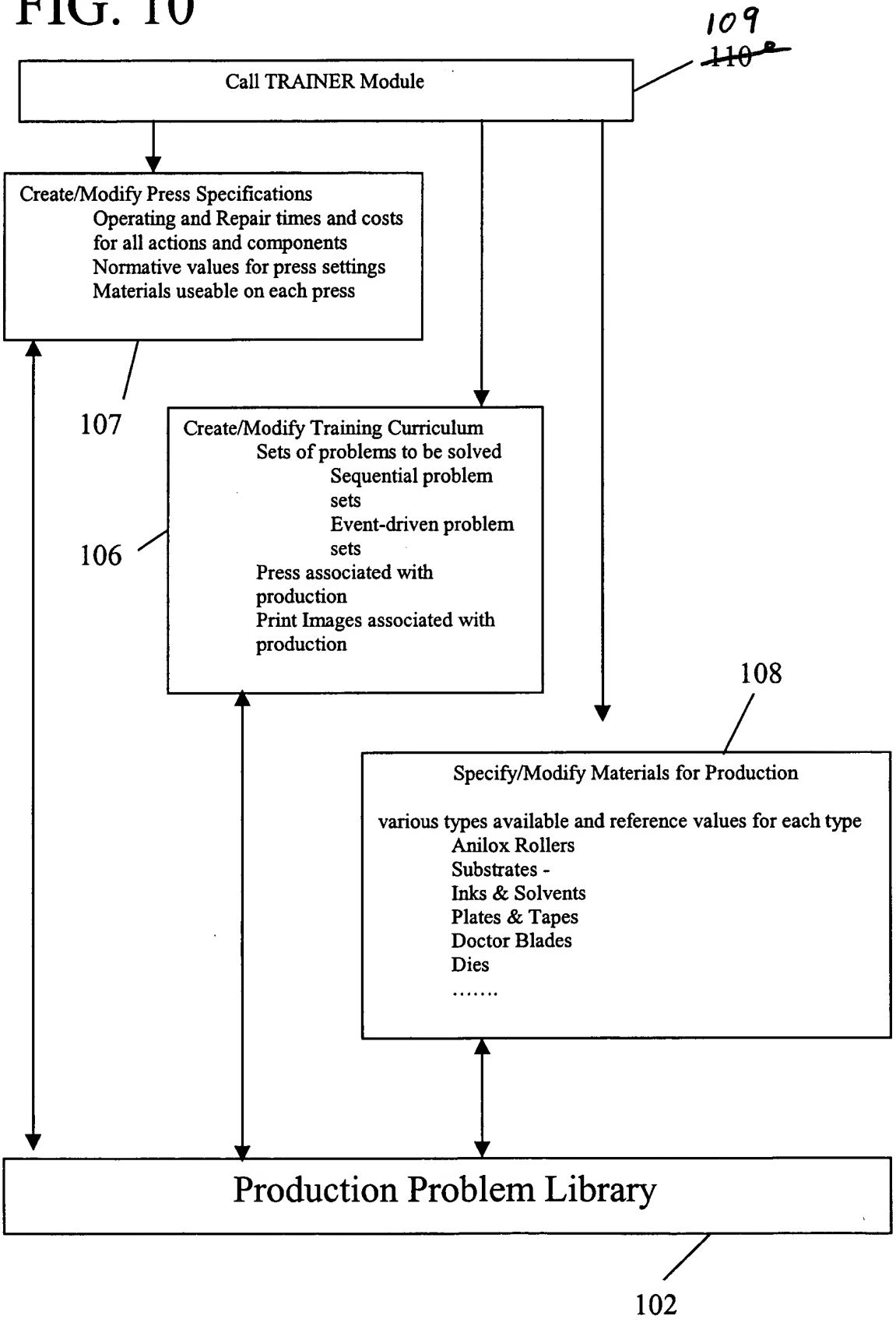

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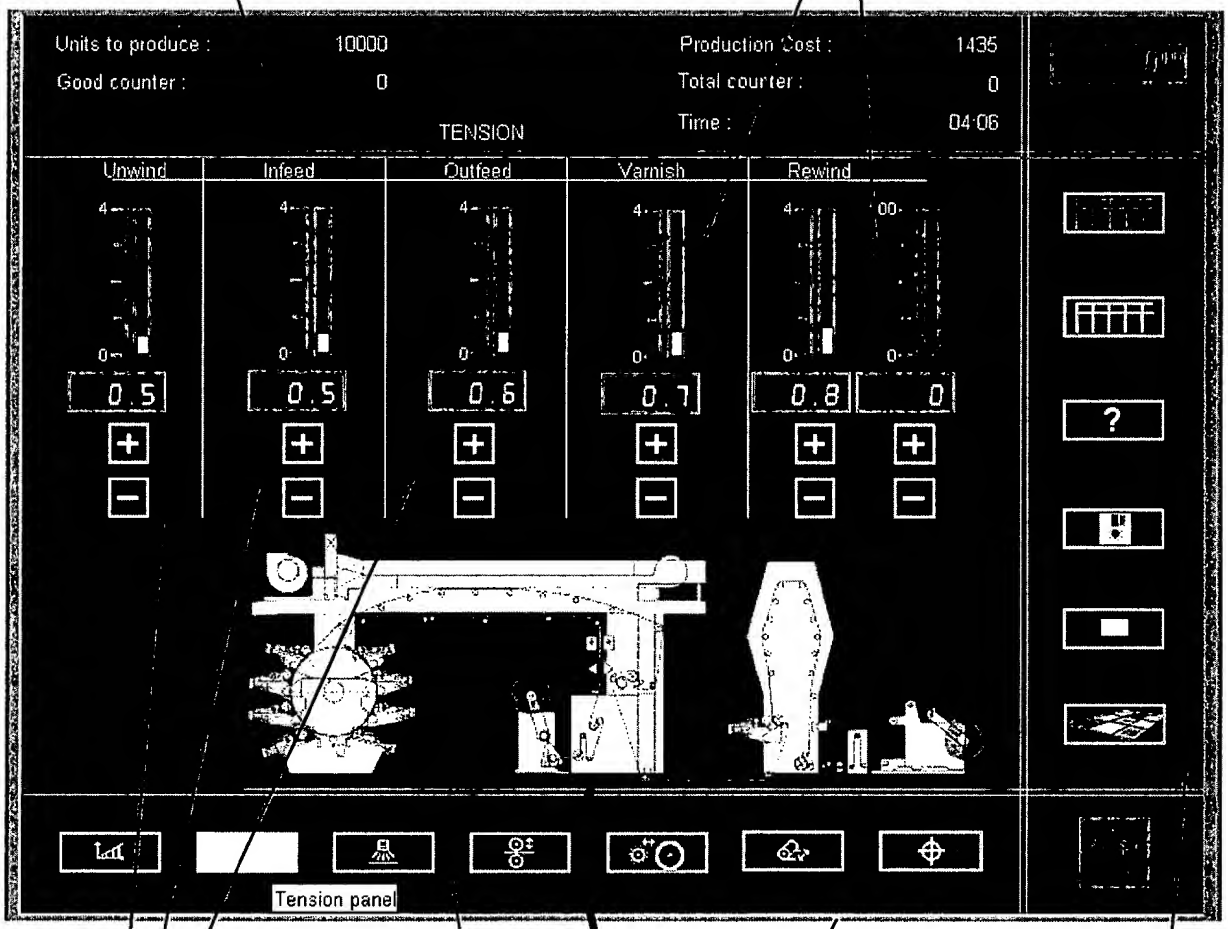
FIG. 13



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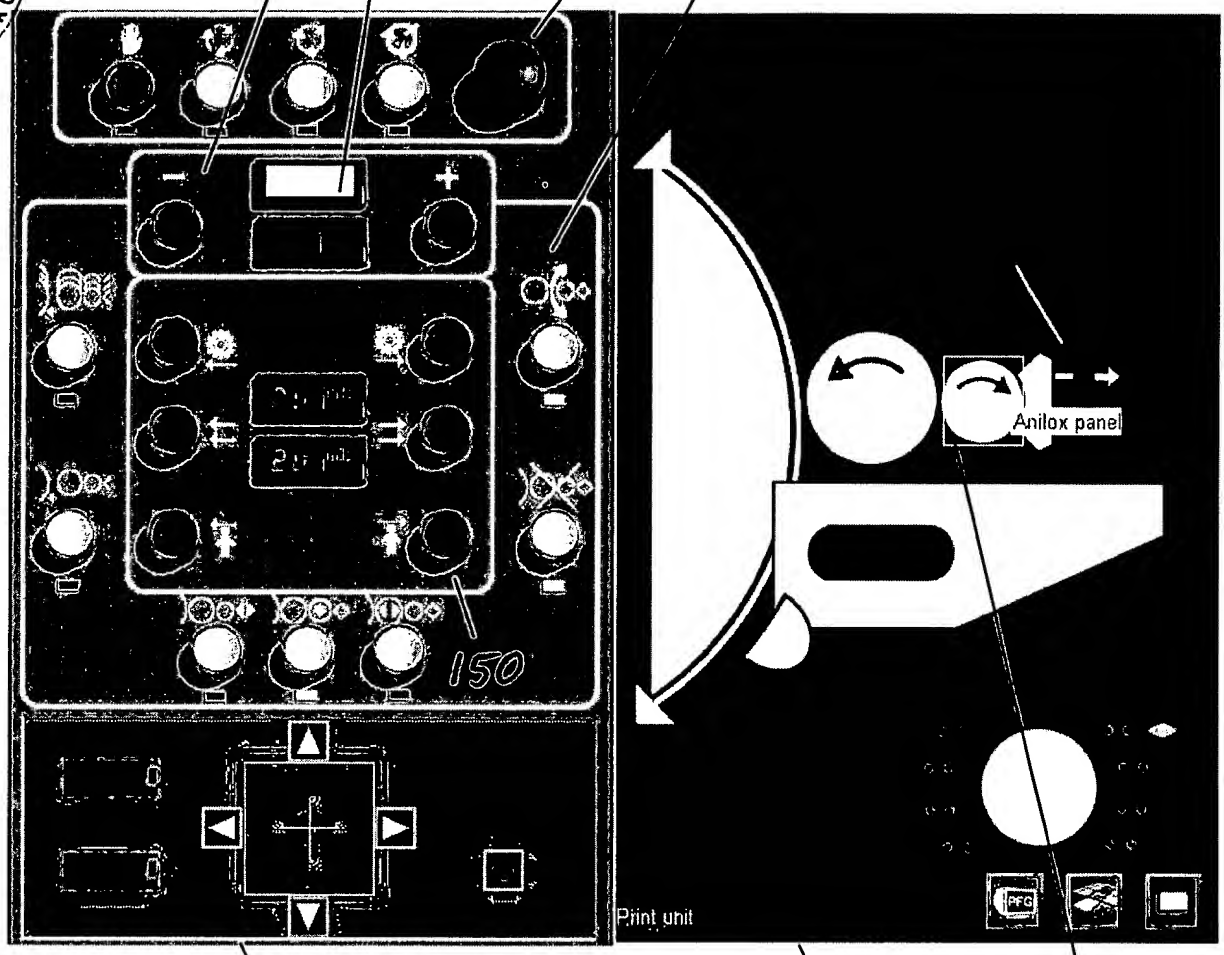
Fig. 14